

CANTRELL v. HEILIG, ET AL

DEPOSITION OF SCOTT ARP

<p>1 about it.</p> <p>2 Q Okay. So did you read any policy directives in preparation</p> <p>3 for this deposition?</p> <p>4 A No.</p> <p>5 Q Okay. And did you create any documents in preparation for</p> <p>6 this deposition?</p> <p>7 A No.</p> <p>8 Q Okay. And have you discussed this lawsuit with anyone else</p> <p>9 other than the attorney?</p> <p>10 A No.</p> <p>11 Q Okay. And have you posted anything about this lawsuit on</p> <p>12 any web site or social media?</p> <p>13 A Oh, Jesus. No.</p> <p>14 Q So with that said let's begin with some background</p> <p>15 information about you and your employment. How long have</p> <p>16 you been employed with the Michigan Department of</p> <p>17 Corrections?</p> <p>18 A About nine and a half years.</p> <p>19 Q Okay. And have you worked at any other facilities other</p> <p>20 than Bellamy Creek?</p> <p>21 A Yes.</p> <p>22 Q So --</p> <p>23 A MCF, Muskegon Correctional Facility.</p> <p>24 Q Okay. When and for how long?</p> <p>25 A I started off there January 2011 until they closed down in</p> <p style="text-align: center;">Page 6</p>	<p>1 each floor?</p> <p>2 A Thirty.</p> <p>3 Q Okay. And where is the -- do you call it the "hub"? Like</p> <p>4 the -- where the --</p> <p>5 A The hub? In the apex of a V so to speak.</p> <p>6 Q Right. Okay. And then is this the same layout that it was</p> <p>7 in, in August 2017?</p> <p>8 A Yes.</p> <p>9 Q And in August 2017, did there come a time where you assisted</p> <p>10 Officer Heilig in housing unit two?</p> <p>11 A Yes.</p> <p>12 Q How did you become aware that your presence was being</p> <p>13 requested on August 19th, 2017?</p> <p>14 A I recall the radio.</p> <p>15 Q And why did you respond?</p> <p>16 A I think I was nearby, but to be honest with you I don't know</p> <p>17 why. If I hear somebody needs help and I'm nearby, I'll go.</p> <p>18 Q Did other officers respond to the plaintiff's cell?</p> <p>19 A Yes.</p> <p>20 Q Who were those officers?</p> <p>21 A Earegood was there and Sergeant Stump was there, and I don't</p> <p>22 remember who else was there.</p> <p>23 Q Who were the supervisors in the housing unit that night?</p> <p>24 A Sergeant Stump was there.</p> <p>25 Q When you got the call, was the sergeant unit in the housing</p> <p style="text-align: center;">Page 8</p>
<p>1 May 2011, and then I went back there November 2015 and I</p> <p>2 came back here August 2017.</p> <p>3 Q So what position do you currently hold right now?</p> <p>4 A A corrections officer.</p> <p>5 Q And what are the duties of that position?</p> <p>6 A Custody and security.</p> <p>7 Q Okay. And is this the shift that you worked in capacity in</p> <p>8 August 2017, a corrections officer?</p> <p>9 A Yes, when I came back here.</p> <p>10 Q And what is your height and weight?</p> <p>11 A I am 5'10, 205 pounds.</p> <p>12 Q So I would like to now ask you questions about the incident</p> <p>13 that occurred on August 19th. Are you approximately the</p> <p>14 same weight that you were in August 2017?</p> <p>15 A Oh, yes.</p> <p>16 Q Okay. Thank you. So now we're moving on to the incident</p> <p>17 that happened on August 19th, 2017. Can you describe for me</p> <p>18 housing unit two?</p> <p>19 A Describe the unit?</p> <p>20 Q Yes, like the layout.</p> <p>21 A I don't know -- I'm going to need more clarifications</p> <p>22 because I could waste all day describing it in detail.</p> <p>23 Q Okay. So how many floors are on housing unit two?</p> <p>24 A Two.</p> <p>25 Q Okay. And how many rooms on each side of the hallway on</p> <p style="text-align: center;">Page 7</p>	<p>1 unit?</p> <p>2 A I don't think right away, but I don't remember.</p> <p>3 Q How many officers were working in the housing unit at the</p> <p>4 time of the incident?</p> <p>5 A I don't know.</p> <p>6 Q And what was your understanding of what happened prior to</p> <p>7 your arrival at the plaintiff's cell?</p> <p>8 A I had zero understanding what happened.</p> <p>9 Q So you just got the radio call that something was happening</p> <p>10 and you --</p> <p>11 A Yes.</p> <p>12 Q -- responded? So when you received this call, what were you</p> <p>13 doing at that time?</p> <p>14 A I don't know.</p> <p>15 Q Okay. And so once you got the call, what did you do?</p> <p>16 A I showed up to B upper left side.</p> <p>17 Q So you were on the bottom floor when you got the call?</p> <p>18 A No. I was not in the unit when I got the call.</p> <p>19 Q Oh, right. And what happened after you arrived at the</p> <p>20 plaintiff's cell?</p> <p>21 A He was saying a lot of cuss words, getting very agitated.</p> <p>22 He was challenging us to go into his unit and fight him --</p> <p>23 into his cell and fight him.</p> <p>24 Q So what other officers were already there when you arrived?</p> <p>25 A I honestly don't recall the exact moment everyone was there.</p> <p style="text-align: center;">Page 9</p>

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<p>1 I just know that Earegood and Heilig and Sergeant Stump was 2 there and there were two others and I honestly can't tell 3 you who -- who they were, but if I were to watch the video 4 again I could tell you who they were.</p> <p>5 Q And do you know any officers who arrived after you were 6 already upstairs?</p> <p>7 A I remember Kammers was there and Gose. I don't think she 8 works here anymore.</p> <p>9 Q And was the plaintiff's bunkie in the cell when this 10 occurred?</p> <p>11 A I'm going to say I can't remember --</p> <p>12 Q And do you --</p> <p>13 A -- because I think he was, but I'm not prepared to swear on 14 that.</p> <p>15 Q Okay. What was Officer Heilig saying at this time? You 16 don't remember?</p> <p>17 A I don't remember.</p> <p>18 Q And do you remember anything that you said?</p> <p>19 A I basically said nothing. I was just there to help.</p> <p>20 Q Do you remember anything other officers were saying?</p> <p>21 A Sergeant Stump told Earegood to turn his ECD on and at that 22 point Cantrell, he put his arms behind his back.</p> <p>23 Q And do you remember some of the things that the plaintiff 24 was saying, specifics?</p> <p>25 A Plaintiff? No, not really.</p> <p style="text-align: center;">Page 10</p>	<p>1 Q Okay. And what did you do as he was backing out?</p> <p>2 A I grabbed his right arm with my left hand.</p> <p>3 Q And what did Officer Heilig do?</p> <p>4 A He was on the other side. He was on the left side.</p> <p>5 Q So did you have any interactions with the plaintiff prior to 6 this incident in August 2017?</p> <p>7 A Negative.</p> <p>8 Q Okay. So no positive interactions?</p> <p>9 A No; no.</p> <p>10 Q No negative? And according to the misconduct hearing 11 report, there were four officers escorting plaintiff on the 12 upper wing. So who were the other officers that were 13 escorting him?</p> <p>14 A Earegood was right behind us with the Taser and Sergeant 15 Stump was with us.</p> <p>16 Q And then which side of the plaintiff were you on?</p> <p>17 A The right side.</p> <p>18 Q Why?</p> <p>19 A Because Heilig was on his left.</p> <p>20 Q And did plaintiff try to resist?</p> <p>21 A At what point?</p> <p>22 Q That was my next question is, was when?</p> <p>23 A Oh, yes. He tried to bump Heilig off the stairs.</p> <p>24 Q So it was from the top of the stairs then? It wasn't from 25 the cell to the top of the stairs?</p> <p style="text-align: center;">Page 12</p>
<p>1 Q Okay.</p> <p>2 A I just remember being challenged to a fight and he said he 3 wanted to fight all of us.</p> <p>4 Q So there was an officer who had a Taser on plaintiff?</p> <p>5 A Yup, by order of Sergeant Stump.</p> <p>6 Q And who was that officer?</p> <p>7 A Officer Earegood.</p> <p>8 Q And did you aide Officer Heilig in removing plaintiff from 9 his cell?</p> <p>10 A I --</p> <p>11 THE WITNESS: -- can I get clarification for what 12 she means by that question?</p> <p>13 MS. SPARKS: So she'll -- you ask her for 14 clarification.</p> <p>15 THE WITNESS: Okay.</p> <p>16 MS. SPARKS: Yeah.</p> <p>17 Q Yeah. So --</p> <p>18 A Can I get clarification?</p> <p>19 Q Uh-huh (affirmative). So when he was being removed from his 20 cell, were you one of the people that helped to remove him?</p> <p>21 A I did not remove him. Nobody removed him. He removed 22 himself and we were just escorting him.</p> <p>23 Q Okay. And can you described how he was removed or came out 24 of his cell?</p> <p>25 A He backed out on his own.</p> <p style="text-align: center;">Page 11</p>	<p>1 A Nope.</p> <p>2 Q Okay. So how did he try to resist?</p> <p>3 A He threw his hip into Heilig.</p> <p>4 Q Okay. And what did you --</p> <p>5 A It was a very subtle bump.</p> <p>6 Q What did you do when you think that you saw that, or felt 7 that this happened?</p> <p>8 A I lost control. He bumped Heilig toward the stairs, I got 9 pushed up against the wall on the stairs and then by the 10 time we got down to the stairs, he started walking really 11 fast away from us and I tried to get control of him and he 12 was not having it. So I finally got control of him and I 13 did trip him so we can put him on the ground to get control 14 of him.</p> <p>15 Q And what did the other officers that were present on the 16 stairs do?</p> <p>17 A As far as?</p> <p>18 Q When the plaintiff began supposedly resisting?</p> <p>19 A I don't know. They were helping get control. Their exact 20 actions will -- would be for them to answer.</p> <p>21 Q And did the plaintiff trip you?</p> <p>22 A No.</p> <p>23 Q Okay. Did you ever fall?</p> <p>24 A No.</p> <p>25 Q So you never lost your balance?</p> <p style="text-align: center;">Page 13</p>

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1 A I lost my balance --
 2 Q Uh-huh (affirmative).
 3 A That's two different questions --
 4 Q Okay.
 5 A -- falling and losing your balance.
 6 Q So did you lose your balance?
 7 A Yes.
 8 Q Okay. So what happened with that? When did you lose your
 9 balance?
 10 A I told you, on the -- in the stairs.
 11 Q Okay. So where were you taking him in this escort?
 12 A We were instructed to take him to unit eight which is our
 13 temporary segregation unit.
 14 Q Okay. And why was he being taken to segregation?
 15 A To be honest with you, that is none of my business at that
 16 concern, at that time. If they need somebody to take
 17 somebody to the segregation unit, I just do it.
 18 Q In August 2017, were you aware that there were cameras
 19 monitoring the housing unit?
 20 A Absolutely; yes.
 21 Q Do you recall hearing Officer Heilig say, "Get ready. I
 22 have something for your bitch ass" --
 23 A No.
 24 Q -- on the top of the stairs? And while escorting the
 25 plaintiff, did you intentionally stick your foot in front of

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1 him bringing him to the ground?
 2 A Yes.
 3 Q Is there a protocol for taking a prisoner to the ground in
 4 this manner?
 5 A Protocol as in what?
 6 Q A policy, a certain training that you received?
 7 A It's within policy to do what's necessary to get him under
 8 control when he's resisting.
 9 Q Okay. And can you explain for me why you believe it's --
 10 like, taking him to the ground was appropriate at the time?
 11 A Because he was trying to get away from us when we were
 12 escorting him to unit eight and he already tried to assault
 13 a friend of mine. And if he's being combative or
 14 threatening to fight us and then having actions that prove
 15 that he's willing to follow through with those verbal
 16 threats, then I didn't want him to hurt anyone else. There
 17 was a female officer that's 5'2" that wasn't far from him
 18 and he's a big dude and if he wanted to run her up against
 19 the wall with his shoulder, he could physically do it.
 20 Q So while the plaintiff was on the ground, was he resisting?
 21 A That's a tough one because I really wasn't -- there's not
 22 much you can do on the ground which is why we take them to
 23 the ground, plus his hands were behind his back.
 24 Q So is that a yes or no?
 25 A I'm going to say I don't know. That's an I don't know.

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1 Q So he wasn't -- was he kicking?
 2 A I did not see him kick.
 3 Q Was he thrashing?
 4 A I don't know what you mean by thrashing, but --
 5 Q Like moving around (indicating).
 6 A -- even if he was thrashing.
 7 MR. MANVILLE: Court reporter --
 8 MS. KESHISH: Can't see --
 9 MR. MANVILLE: -- doesn't know what you're doing.
 10 Q So was he trying to throw elbows?
 11 A I'm going to say no.
 12 Q Were you hit or struck after plaintiff was on the ground?
 13 A No.
 14 Q Okay. On August 19th, 2017, did you hit the plaintiff?
 15 A No.
 16 Q Did you kick the plaintiff?
 17 A No.
 18 Q Did you witness any other officers hitting or kicking the
 19 plaintiff?
 20 A No.
 21 Q Once the plaintiff was on the ground, was the sergeant
 22 present?
 23 A I'm going to say I don't know. To be honest with you, if I
 24 were to say yes it'd be purely speculation because I think
 25 he was there, but a hardcore "I don't know."

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1 Q That's okay.
 2 A You need definites; correct?
 3 Q (Nodding head in affirmative)
 4 A Yup.
 5 Q What force was used against the plaintiff while he was on
 6 the ground?
 7 A I don't think any. I don't know. None by me.
 8 Q Okay. Did you --
 9 A We -- we helped --
 10 Q -- sorry.
 11 A -- we helped him up.
 12 Q Did you sustain any injuries?
 13 A No.
 14 Q Are you aware of any other officers that sustained any
 15 injuries?
 16 A I am not aware.
 17 Q Okay. Are you aware of any injury reports that came out of
 18 this incident?
 19 A No.
 20 Q Was there a critical incident report in this matter?
 21 A I believe so.
 22 Q So now we're going to watch the videos that were produced.
 23 MR. MANVILLE: Hold on a minute. Let me -- okay,
 24 before you do that.
 25 Q* Okay. On the date of the incident, how long had you been

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1 lines.
2 Q* Okay. All right. So 8/19/2007 (sic) incident happened and
3 you started off saying that you walked up to cell 2-246.
4 A Yes.
5 Q* Okay. I was just surprised because usually if there's a
6 call for need for help, I'm used to officers running. Okay?
7 A Okay.
8 Q* Okay. So I was just wondering why you put "walked" instead
9 of "running."
10 A If there's no imminent danger, then --
11 Q* Okay.
12 A -- what's the use of --
13 Q* Okay.
14 A -- creating more panic?
15 Q* Okay. Then as you said in here, okay, "Cantrell was
16 yelling" and, "Inmate Cantrell said 'Fuck you. I need to
17 talk to a sergeant now'; right? According to this report?
18 A Correct.
19 Q* But the sergeant was right there; right?
20 A Maybe not right away and I -- I stated this earlier, I don't
21 remember at what point did he enter into the --
22 Q* Okay. I just wanted --
23 A -- incident.
24 Q* -- based upon your thing.
25 A Sure.

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1 Q* Yeah, it doesn't make that distinction.
2 A Okay.
3 Q* So I wanted to make sure.
4 A Right.
5 Q* Okay. Then it -- then, "Sergeant Stump approached the cell
6 and told Cantrell to cuff up." And he did once the other
7 officer turned on his ECD; right?
8 A Correct.
9 Q* Then you have -- and I may be wrong, "Heilig applied
10 restraints." You're talking about the handcuffs only;
11 right?
12 A Oh, yup.
13 Q* Okay. Not -- not -- when you're talking about restraints, I
14 don't know whether you're meaning --
15 A Gotcha.
16 Q* -- you know, take down or whatever.
17 A Wrist restraints.
18 Q* Okay. So at that point it was just the handcuffs?
19 A Yup, wrist restraints.
20 Q* Okay. Okay. Wrist restraints. Okay. That's good. All
21 right. And "I escorted Cantrell." Okay. So my
22 understanding -- and we'll show you on the video -- is that
23 there was a camera on the wall back there.
24 A Yes.
25 Q* And it shoots towards the stairs?

Page 23

1 A Okay.
2 Q* Okay. Have you ever seen the videos of -- of that?
3 A Yes.
4 Q* Okay. Does that include the -- would that video include the
5 cell that Cantrell was in? The front his cell?
6 A The front, yes.
7 Q* Right. Okay. That's what I meant. Okay. So then if
8 Trent -- if Cantrell had left his cell earlier that day or
9 not left his cell but stood in the doorway of his cell and
10 kept his cell door from closing, then that should show on
11 the video, would you agree?
12 A I am not agreeing or disagreeing with that statement.
13 Q* Okay. Because you just said that it should show his -- the
14 front of his cell; right?
15 A Right. But you, you should probably talk to a electronic
16 monitoring officer to ask -- ask that question to.
17 Q* Okay. Well, we're going to get that video. We don't have
18 it yet.
19 A Okay.
20 Q* So that's why I was just asking you --
21 A Good.
22 Q* -- whether you're --
23 A Sure.
24 Q* -- familiar with it because you've said you had looked at
25 that, you know, video and it showed at least the front of

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1 his cell.
2 A Right. I don't know how far into his cell it shows.
3 Q* No; no. I'm not talking about into his cell. I'm just
4 talking about the front part --
5 A Gotcha.
6 Q* -- where the door -- with the door closed?
7 A How about we watch the video and then you don't have to ask
8 my opinion?
9 Q* Okay. Well -- okay. We don't have that video.
10 A Okay.
11 Q* Or I would not ask you these questions.
12 A Oh, I'm sorry.
13 MS. SPARKS: I think -- yeah, I think he's
14 confused.
15 MR. MANVILLE: Okay.
16 Q* No. I was just trying to get your recollection whether it
17 would, okay, you know, because you said you had saw it
18 before.
19 A Gotcha.
20 Q* So if you saw it before, then I'm asking if the door opened,
21 would it show the door being open?
22 A I don't know.
23 Q* Okay. That's what I'm getting at.
24 A There's -- there's a possibility that that particular door
25 might be beyond the camera.

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7 (Pages 22 to 25)

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1 Q* Okay.
2 A And I'm not a hundred percent familiar.
3 Q* Okay. That's good.
4 A So -- so we'll just say maybe.
5 Q* All right. Then I think you've already said that from the
6 cell to the -- to the top of the stairs --
7 A Yes.
8 Q* -- there was no resistant (sic) from Cantrell?
9 A Correct.
10 Q* Okay. Then once you got there is this stairwell wide enough
11 that you being on the right with Cantrell and Heilig being
12 on the left, that the three of you could walk down the cell
13 (sic) parallel to each other?
14 A Yes.
15 Q* Okay. I couldn't remember whether it was wide enough. We
16 went in --
17 A Gotcha.
18 Q* -- earlier today.
19 A Okay.
20 Q* Okay. So when you got to the top of the stairs, the rail is
21 on the left side; right?
22 A Yeah.
23 Q* Going down the stairs?
24 A There's -- there's a handrail on the right --
25 Q* Okay.

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1 A -- and that's connected to the wall.
2 Q* All right.
3 A And then the handrail on the left goes straight down --
4 Q* Right.
5 A -- to the bottom, to the next floor.
6 Q* Right. So if somebody pushed you on the right, you'd only
7 run into the wall. If somebody pushed you to the left, you
8 could possibly go over the railing and fall to -- to the
9 floor base; right?
10 A Correct.
11 Q* Okay. So when you got to the stairwell, were you parallel
12 to Cantrell?
13 A I believe so.
14 Q* Okay. Because, you know, using the lawsuit as the example
15 if, you know, I have two choices while escorting him.
16 A Right.
17 Q* Is one is grabbing their arm and walking right next to them
18 or kind of walking like a step behind.
19 A I might have been a step behind.
20 Q* Okay.
21 A I might have been right behind. I might have did this
22 (indicating) sort of thing.
23 Q* Okay.
24 A I might have been right next to him. I might have been one
25 step back and forth.

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1 Q* Okay. All right. You don't have one -- one standard
2 procedure like usually always walking, like, a step behind
3 them?
4 A Well, when you -- when you escort somebody, you might try
5 to --
6 Q* Yeah. I was just wondering. That's -- some people, you
7 know, have a standard way of doing stuff.
8 A Right.
9 Q* From what you're saying, you don't have a standard way?
10 A Well, I try to walk right next to them, but --
11 Q* Okay. All right. All right.
12 A -- I'm not in control of how fast that person walks.
13 Q* Right. But if you have a -- if you both have a hold of his
14 arm, don't you in a way control how fast they walk?
15 A Absolutely not.
16 Q* Okay. All right. And was -- was he walking too fast when
17 you got up to the stairs?
18 A Until we got to the stairs we were fine.
19 Q* Okay.
20 A He was fine, I was fine, and then once we got --
21 Q* Once you got --
22 A -- to the top of the stairs --
23 Q* Sorry. I got to let you answer before I can ask.
24 A Okay.
25 Q* Okay. So when you got to the stairs did he call you names?

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1 Did he say anything? Did he, you know --
2 A Not that I remember.
3 Q* Okay. Because earlier you said in his cell he threatened to
4 beat everybody's ass; right?
5 A Right.
6 Q* Okay. But at the stairs he wasn't -- he didn't say that
7 before you guys started down the stairs?
8 A I don't remember.
9 Q* Okay. All right. And then when you got to the stairs, if
10 you remember did he bump you first or did he bump Heilig
11 first?
12 A He didn't bump me at all.
13 Q* Okay.
14 A And -- so when he bumped into Heilig --
15 Q* All right.
16 A -- I don't know who bumped who, but I was getting pushed up
17 against the wall at some point.
18 Q* Okay. And -- but you didn't consider that an assault by
19 plaintiff on you when you -- when you got pushed against the
20 wall?
21 A I don't know what I would have considered that.
22 Q* Okay. Because you didn't write a misconduct ticket, did
23 you?
24 A No. I did not.
25 Q* Right. And going down the -- when you start going down the

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1 stairs, okay, your body is kind of switching back and forth,
 2 right, because you're taking a step, and then you take
 3 another step. Your body, you know, kind of swings --
 4 A Quite frankly going down the stairs was a mess.
 5 Q* I'm sorry. What?
 6 A Going down the stairs was a mess. Once he bumped into
 7 Heilig we were trying to get control of him and there was no
 8 escort at that point.
 9 Q* How were -- yeah. How were you trying to get control of
 10 him?
 11 A I was trying to grab his arm.
 12 Q* But you already had his arm; right? When you were walking
 13 down on the second floor, when you were walking down the
 14 hallway to the stairs, you had ahold of his arm; right?
 15 A Right. But if you're following the chain of events, when he
 16 bumped into Heilig then I lost grip and I got pushed up
 17 against the wall.
 18 Q* Okay. I -- this is the first time I heard you say that you
 19 lost a grip so that's why I asked you and I said, "What did
 20 you mean?"
 21 A Oh, okay.
 22 Q* Okay. So you had not, that I remember, you mentioning that
 23 you had lost a grip. So what you're saying --
 24 A Okay. Gotcha.
 25 Q* -- is that when you were bumped, okay, your normal hold of

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1 him with the left hand --
 2 A Right.
 3 Q* -- with your left hand on his right arm. And was that below
 4 the elbow when you're --
 5 A Above the elbow.
 6 Q* Above the elbow?
 7 A Yes.
 8 Q* So up in the bicep area?
 9 A Probably more like the tricep area.
 10 Q* Okay. All right. Then, all right, you lost control and
 11 when you say you tried to get control of him again, what are
 12 you -- where were you grabbing at, at that point in time?
 13 A Trying to grab his arm again.
 14 Q* Okay. Same place?
 15 A Yup.
 16 Q* Or any place on the arm?
 17 A Yup. I was actually trying to get a -- the shoulder lock at
 18 that point.
 19 Q* Okay. When we're talking about the shoulder block (sic),
 20 you're talking about putting your right hand underneath his
 21 right arm; right?
 22 A Well, I was trying to get my left hand in front of his right
 23 arm so I could put my left hand on the back of his shoulder
 24 and get a better grip to where he's less likely to --
 25 Q* Okay. Do you --

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1 A -- assault somebody.
 2 Q* Do you remember having your left hand on the back of his
 3 neck?
 4 A No.
 5 Q* Do you -- did you use that method of trying to control him?
 6 A No. I don't think so.
 7 Q* Okay.
 8 A I'm pretty sure I did not.
 9 Q* All right. All right. So what you're saying is that you're
 10 trying to use your right arm --
 11 A Left arm.
 12 Q* -- left -- left arm to get ahold of his right arm again.
 13 A Yes.
 14 Q* And then did you ever before you get to the bottom of the
 15 stairs --
 16 A No.
 17 Q* -- obtain that position?
 18 A No.
 19 Q* Okay. But you did have some hold of him while you're going
 20 down the stairs; right?
 21 A Quite frankly I don't know.
 22 Q* Okay. All right.
 23 A It was very chaotic.
 24 Q* Okay. All right. Was it because he was running down the
 25 stairs and trying to drag you guys after him? When you say

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1 It's very chaotic, I'm just wondering why.
 2 A Right.
 3 Q* I mean, what was going on that made it chaotic?
 4 A He tried to knock Heilig off the stairs and we were all off
 5 balance.
 6 Q* Right; right. And that was at the top of the stairs; right?
 7 A Correct.
 8 Q* Okay. And I think you had something like another -- and I
 9 may be wrong, but like another ten stairs to go down? I
 10 don't know the exact number on that stuff.
 11 A Something like that, yeah.
 12 Q* Okay. And, but then -- so after that, I mean, were you
 13 guys, like, on your feet but kind of running down the stairs
 14 because you're off balance, or were you just regularly
 15 walking down the stairs? So what I'm getting at --
 16 A Oh, we were on our stair -- we were on our feet --
 17 Q* Right.
 18 A -- and probably walking fast.
 19 Q* Okay. That's what I was getting at.
 20 A Okay.
 21 Q* Because it's kind of like you're saying you're kind of out
 22 of control and you weren't running, but yet you weren't
 23 doing the regular walk; right?
 24 A Right. Walking fast.
 25 Q* Right. Walking fast.

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9 (Pages 30 to 33)

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<p>1 A We'll land on those words.</p> <p>2 Q* Okay. And so besides that initial bump at the top --</p> <p>3 A Okay.</p> <p>4 Q* -- into Heilig, did Cantrell assault you while going down</p> <p>5 the stairs?</p> <p>6 A I'm going to say no, not really.</p> <p>7 Q* Okay. Okay.</p> <p>8 A His body went up against my body and pushed me up against</p> <p>9 the wall.</p> <p>10 Q* Right. But --</p> <p>11 A But with all those people involved, I'm --</p> <p>12 Q* -- okay, but that was at the --</p> <p>13 A -- I'm not going to say --</p> <p>14 Q* Yeah.</p> <p>15 A -- he intentionally pushed me up against the wall.</p> <p>16 Q* Okay. But was the only time that his body pushed you</p> <p>17 against the wall, was that at the top of the stairs or all</p> <p>18 the way down the stairs? I know. It's a difficult</p> <p>19 question.</p> <p>20 A It felt like a couple steps down.</p> <p>21 Q* Okay. Okay. But then after that was his body off you?</p> <p>22 A I think so.</p> <p>23 Q* Okay. Okay. And did you have any -- besides that you guys</p> <p>24 are moving, you know, at, you know, greater than a normal</p> <p>25 speed, what you have -- what issues were you having trying</p> <p style="text-align: center;">Page 34</p>	<p>1 A Okay.</p> <p>2 Q* But I always try to, you know, see what your memory is --</p> <p>3 A Gotcha. Well --</p> <p>4 Q* -- before we watch that.</p> <p>5 A -- I've said several times on the stairs --</p> <p>6 Q* Right.</p> <p>7 A -- It was really chaotic --</p> <p>8 Q* Right.</p> <p>9 A -- and I don't -- I don't have a straight answer.</p> <p>10 Q* Okay.</p> <p>11 A I just remember getting pushed up up against the wall and --</p> <p>12 Q* Okay. But up against the wall, you're off the wall, then</p> <p>13 were you on the wall again?</p> <p>14 A I don't know.</p> <p>15 Q* Okay. And --</p> <p>16 A I don't know.</p> <p>17 Q* Okay. Because, okay, you're -- I know you know this so it's</p> <p>18 kind of foolish to ask it, but --</p> <p>19 A Okay.</p> <p>20 Q* -- okay, you're familiar with the -- with I think they call</p> <p>21 it the shoulder escort maneuver?</p> <p>22 A Are you saying the shoulder lock?</p> <p>23 Q* Lock. Okay. Shoulder lock. Okay. And when you implement</p> <p>24 the shoulder lock, you kind of have to turn your -- you</p> <p>25 know, if my right arm is next to the inmate's left arm, do I</p> <p style="text-align: center;">Page 36</p>
<p>1 to bring him -- for you on your side to bring, you know, to</p> <p>2 use your hand to control him?</p> <p>3 A At what point?</p> <p>4 Q* Going down the stairs.</p> <p>5 A Like in the middle of going down the stairs.</p> <p>6 Q* All right. We'll start -- we'll start at the top. Okay.</p> <p>7 That's when you first started -- you know, you lost control</p> <p>8 and you tried to get control; right?</p> <p>9 A Right.</p> <p>10 Q* And was that, like, two, three steps down from the top?</p> <p>11 A Somewhere; three to five.</p> <p>12 Q* Okay. Then say you're at the fifth or sixth stairs,</p> <p>13 assuming there's ten --</p> <p>14 A Right.</p> <p>15 Q* -- were you still trying to get control of him?</p> <p>16 A Yes.</p> <p>17 Q* Okay. And what -- was there difficulty as a result of the</p> <p>18 speed you were going or was the -- or what was the</p> <p>19 difficulty of bringing him under control?</p> <p>20 A He was just moving around. He was moving fast, moving back</p> <p>21 and forth, wiggling. I -- I -- I don't have a straight</p> <p>22 answer.</p> <p>23 Q* Yeah. Okay. No.</p> <p>24 A And if you haven't seen the video, you should watch it.</p> <p>25 Q* Okay. We are. Don't worry about that.</p> <p style="text-align: center;">Page 35</p>	<p>1 got to -- do I put my left arm underneath their armpit or</p> <p>2 how do I do it? Okay. Can you explain to me that stuff?</p> <p>3 You're -- okay.</p> <p>4 A Okay.</p> <p>5 Q* The inmate is on your right -- on your right arm and it's</p> <p>6 his left.</p> <p>7 A Inmate (indicating).</p> <p>8 Q* Right.</p> <p>9 A Okay.</p> <p>10 Q* Right. Okay. How do you do -- how do you do that? And</p> <p>11 using your counsel --</p> <p>12 A Okay.</p> <p>13 Q* -- you know, we'll volunteer her.</p> <p>14 A You'd go to the front of the arm.</p> <p>15 Q* Okay. But what --</p> <p>16 A Your arm would be the front of his arm.</p> <p>17 Q* Okay. Which arm?</p> <p>18 A Your right arm would be the front of his left arm.</p> <p>19 Q* Okay. All right.</p> <p>20 A And then you put your arm in between the arm and the body.</p> <p>21 Q* Right. Okay. But this --</p> <p>22 A And then you maneuver your hand behind the bicep.</p> <p>23 Q* Okay. But let me ask you this --</p> <p>24 A And your elbow would be locked with his elbow in the front.</p> <p>25 Q* Okay. Okay. Does that require you to do some turning of</p> <p style="text-align: center;">Page 37</p>

10 (Pages 34 to 37)

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<p>1 A Okay.</p> <p>2 Q* -- and there's a base camera there, right, taking pictures</p> <p>3 of the stairs?</p> <p>4 A Yes.</p> <p>5 Q* Videotaping it? All right. And so what were the three of</p> <p>6 you doing once you got to base?</p> <p>7 A Once we got to the bottom of the stairs; right?</p> <p>8 Q* Right. And stepped on base.</p> <p>9 A And stepped on the base.</p> <p>10 Q* Okay.</p> <p>11 A Right?</p> <p>12 Q* Right.</p> <p>13 A I tried to get the shoulder lock position on him. He flexed</p> <p>14 his arms and said, "You're not getting control of me" and he</p> <p>15 just kept walking forward even faster with nobody escorting</p> <p>16 him anymore.</p> <p>17 Q* When you say "nobody escorting him," does that mean you lost</p> <p>18 contact with him again?</p> <p>19 A It was, yeah, correct. His -- his arms -- he's a big dude.</p> <p>20 Q* Right; yeah; we know.</p> <p>21 A For me to grab his arm, I have zero grip on his arm. That's</p> <p>22 why I tried to get the shoulder lock position --</p> <p>23 Q* Right.</p> <p>24 A -- because he was noncompliant at that point. And he flexed</p> <p>25 his arms and he created a gap and I tried to get my hand in</p> <p style="text-align: center;">Page 42</p>	<p>1 him or not?</p> <p>2 A At that point I didn't know if Heilig had contact with him,</p> <p>3 but Heilig was right there.</p> <p>4 Q* Right. Okay. And he was on the other --</p> <p>5 A He was on the other side.</p> <p>6 Q* Yeah. So it's hard for you to see.</p> <p>7 A So what kind of contact Heilig had with him I don't know.</p> <p>8 Q* And you were more interested in obtaining contact with him</p> <p>9 so you're -- you're paying more attention to what you were</p> <p>10 doing?</p> <p>11 A Correct.</p> <p>12 Q* Okay. And if you remember, was the sergeant and the camera</p> <p>13 guy still behind you?</p> <p>14 A Yes.</p> <p>15 Q* Then when did you decide to take him to the ground?</p> <p>16 A When I saw that he was almost ready to go through the door,</p> <p>17 right, and there were other officers on the other side of</p> <p>18 that door and other officers just coming around to where we</p> <p>19 were on the base. I didn't want him running into anybody</p> <p>20 else. So I couldn't get control of him with the shoulder</p> <p>21 lock position, he flexed his arms, and so I'm like, I'm</p> <p>22 going to take him to the ground so he doesn't harm anyone</p> <p>23 else.</p> <p>24 Q* So when you're -- okay, he was eventually escorted out of</p> <p>25 the unit, right, and over to eight unit?</p> <p style="text-align: center;">Page 44</p>
<p>1 there and I couldn't. He's a strong dude.</p> <p>2 Q* Going down the stairs you're trying to get your arm in, in</p> <p>3 there; right?</p> <p>4 A No.</p> <p>5 Q* You were not?</p> <p>6 A No.</p> <p>7 Q* Okay. So you don't know whether he had flexed on the</p> <p>8 stairway so that you could not do that?</p> <p>9 A Right. I did -- yeah, it wasn't until we got down to the</p> <p>10 bottom of the stairs that I tried to get the shoulder lock</p> <p>11 position on him.</p> <p>12 Q* Okay. So -- okay. Sorry. So when you're going down the</p> <p>13 stairs, you still get your hand on his hand?</p> <p>14 A I don't know.</p> <p>15 Q* Okay. You don't -- okay. That's -- I'm just wondering.</p> <p>16 A Okay.</p> <p>17 Q* We've got to assume you probably had some type of contact?</p> <p>18 A Again, in the position we're in, assumptions is going to get</p> <p>19 everybody in trouble, so --</p> <p>20 Q* Okay. All right. No problem.</p> <p>21 A -- I'm not assuming anything.</p> <p>22 Q* Okay. And -- okay. So you're on base. You're saying that</p> <p>23 he's trying to walk fast to get away from the two of you.</p> <p>24 A Right.</p> <p>25 Q* Do you know whether -- I like -- have -- had contact with</p> <p style="text-align: center;">Page 43</p>	<p>1 A Okay. We're skipping to where he's getting escorted?</p> <p>2 Q* Right. No. But -- but I wanted -- my question was, was</p> <p>3 that the door you're talking about that he was headed to was</p> <p>4 the door leading out of the unit and over to eight unit when</p> <p>5 you said he was headed to the door?</p> <p>6 A No, not quite that door.</p> <p>7 Q* Okay. Which door?</p> <p>8 A The door that -- well, once you past that door, then you</p> <p>9 have to go through another --</p> <p>10 Q* Right.</p> <p>11 A -- door to go to eight block.</p> <p>12 Q* Okay.</p> <p>13 A But there's also the officer's station right there, too.</p> <p>14 Q* Okay. Are you saying he was headed to the officer door?</p> <p>15 A No.</p> <p>16 Q* Which door was he headed toward?</p> <p>17 A I just told you.</p> <p>18 Q* I didn't think -- I thought you said that there's officers</p> <p>19 on the other side and there's another door out there, so --</p> <p>20 and there's the officer door there, so I never felt that I</p> <p>21 got an answer as to which door he was heading -- which door</p> <p>22 you said he was heading towards.</p> <p>23 A The door that leads to the officer's station door.</p> <p>24 Q* Okay.</p> <p>25 A That could also lead to going outside.</p> <p style="text-align: center;">Page 45</p>

12 (Pages 42 to 45)

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<p>1 here and didn't show up.</p> <p>2 MR. MANVILLE: We don't need the exact date.</p> <p>3 MS. SPARKS: Yeah.</p> <p>4 Q Yeah, we don't need the exact date.</p> <p>5 A A week ago.</p> <p>6 MR. MANVILLE: Okay.</p> <p>7 Q And is it the same answer for the institutional video as</p> <p>8 well?</p> <p>9 A Correct.</p> <p>10 Q Okay. So now we're going to watch the ECD video first.</p> <p>11 A And you watched it?</p> <p>12 Q Yes. We've watched it.</p> <p>13 (Reviewing video on electronic device)</p> <p>14 MR. MANVILLE: Stop for a minute.</p> <p>15 Q* That "13" over there in the bottom right-hand corner --</p> <p>16 A The what?</p> <p>17 Q* The "13."</p> <p>18 A Okay.</p> <p>19 Q* Do you know what that is?</p> <p>20 A I don't. I'm sorry.</p> <p>21 Q* No. That's all right. We have to ask.</p> <p>22 A Yeah.</p> <p>23 Q* Yeah. We don't get a, you know, oral cheat sheet --</p> <p>24 A Oh, gotcha.</p> <p>25 Q* -- to go with these videos to tell us --</p> <p style="text-align: center;">Page 50</p>	<p>1 A Looks like I am in the cuff of his elbow.</p> <p>2 Q* Okay. No, that's good.</p> <p>3 A And my hand is -- it looks like it's more grabbing maybe his</p> <p>4 bicep or tricep; bicep/tricep area.</p> <p>5 Q* Okay. Okay. But it's right in the elbow area; right?</p> <p>6 A Correct.</p> <p>7 Q* Okay.</p> <p>8 MS. SPARKS: And that's at 31.</p> <p>9 (Review of video)</p> <p>10 A Yeah, I'm definitely grabbing his bicep/tricep area.</p> <p>11 Q* Okay. I see.</p> <p>12 (Review of video)</p> <p>13 MR. MANVILLE: Stop.</p> <p>14 Q* That yellow stuff is -- is the railing on the right-hand</p> <p>15 side on the wall; right?</p> <p>16 A Correct.</p> <p>17 Q* Okay. And you're still on the right?</p> <p>18 A Correct.</p> <p>19 Q* And Heilig is on the left. And up to now has plaintiff done</p> <p>20 anything?</p> <p>21 A Yup; absolutely.</p> <p>22 Q* What?</p> <p>23 A He threw his hip into Heilig.</p> <p>24 Q* Okay.</p> <p>25 A Right before you paused it.</p> <p style="text-align: center;">Page 52</p>
<p>1 A Oh, I thought you knew what it was.</p> <p>2 Q* Well, we think we do.</p> <p>3 A I don't know what it means.</p> <p>4 Q* Okay. All right.</p> <p>5 (Review of video)</p> <p>6 Which, which one is you there?</p> <p>7 A I'm not in that video yet.</p> <p>8 Q* Okay. All right.</p> <p>9 A There's a chance that that might be my hand in the bottom</p> <p>10 left corner. There's a chance, but we'll find out later.</p> <p>11 Q* Okay. All right.</p> <p>12 MS. SPARKS: Can we say we're at 19 in that --</p> <p>13 MR. MANVILLE: Right.</p> <p>14 (Review of video)</p> <p>15 A Oh, seconds into the video. Got it. All right. I learned</p> <p>16 something.</p> <p>17 Q So would you say that this is you?</p> <p>18 A I don't know, but probably. I don't see my face.</p> <p>19 (Review of video)</p> <p>20 Q* All right. All right. It seems you started off with the</p> <p>21 right hand on him, then you switched to the left hand?</p> <p>22 A Right.</p> <p>23 Q* Okay. Yeah. It made more sense. All right. And it seems</p> <p>24 you're -- you've got him between the elbow and his wrist</p> <p>25 right now; right?</p> <p style="text-align: center;">Page 51</p>	<p>1 Q* Oh, right before?</p> <p>2 MR. MANVILLE: Do you want to go back for a</p> <p>3 second?</p> <p>4 MS. KESHISH: Uh-huh (affirmative).</p> <p>5 MS. SPARKS: And we were just at 52.</p> <p>6 MR. MANVILLE: All right.</p> <p>7 Q* We're back at 49; right?</p> <p>8 (Review of video)</p> <p>9 Okay. Where did he throw the hip?</p> <p>10 A What are you talking?</p> <p>11 Q* Right. I'm just asking you.</p> <p>12 A He threw his left hip into Heilig.</p> <p>13 Q* Okay.</p> <p>14 MR. MANVILLE: All right. Go back for a minute.</p> <p>15 Q* As we're going on, when you see that happen let us know.</p> <p>16 (Review of video)</p> <p>17 A Right there (indicating).</p> <p>18 Q* Okay. And that was before 54, so 52 to 54 you're saying</p> <p>19 that it shows that he threw his -- his left hip?</p> <p>20 A Absolutely.</p> <p>21 Q* Started saying his right. And it looks like you're --</p> <p>22 you're behind him right now; right?</p> <p>23 A Right.</p> <p>24 Q* And it looks like Heilig is behind him; right?</p> <p>25 A Correct.</p> <p style="text-align: center;">Page 53</p>

14 (Pages 50 to 53)

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1 Q* Okay.
2 A -- I will tell you what I'm trying to do at this time.
3 Q* Okay.
4 A I am trying to get my left hand underneath his arm so I can
5 get the shoulder lock position going.
6 Q* Okay. And can you tell me why you are not able to get
7 your --
8 A Because he's flexing his arm and he straight up told me,
9 "You're not going to get control of me."
10 Q* Okay.
11 MR. MANVILLE: All right. Continue on.
12 MS. SPARKS: And that was at :40.
13 MR. MANVILLE: All right.
14 (Review of video)
15 Q* All right. And you're -- and he's being taken to the ground
16 there; right?
17 A Correct.
18 Q* And that's when you said you tripped him; right?
19 A Correct.
20 Q* Okay. And as to the door that we were talking about
21 earlier --
22 A It would be directly to the right.
23 Q* It would be the right when we're facing the video?
24 A Yes.
25 Q* Okay. And it would be to -- to your left when you're

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1 having, you know --
2 A It's probably straight ahead where I'm at.
3 Q* Okay. Okay. But I'm just saying, but -- okay. And what is
4 that, 4- --
5 MS. KESHISH: -2.
6 MR. MANVILLE: What?
7 MS. KESHISH: :42.
8 MR. MANVILLE: Okay.
9 MS. KESHISH: Keep going?
10 MR. MANVILLE: All right. Yeah.
11 (Review of video)
12 MR. MANVILLE: Stop it.
13 Q* Where are you here?
14 A I'm at the back end.
15 Q* You're here, the officer with the hat on with your back
16 right to us; right?
17 A Correct.
18 Q* Okay.
19 MR. MANVILLE: Continue.
20 MS. SPARKS: And that was at :47.
21 MR. MANVILLE: Right.
22 (Review of video)
23 MR. MANVILLE: Stop it.
24 Q* All right. It seems you're moving around --
25 A Yes.

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1 Q* -- right? Okay. Is it because of Cantrell or because of
2 all these officers there and everybody trying to, you know,
3 grab ahold of him?
4 A There's probably a little bit too many officers trying to do
5 the same thing.
6 Q* Okay. I just wanted -- If you remember, did he strike you
7 at that time period when you got him on the floor?
8 A Unh-unh (negative).
9 Q* Did, you know, and it seems you were --
10 MS. SPARKS: That's a "no"? That's a "no"?
11 A No.
12 Q* -- "no"?
13 A No. He did not strike me.
14 Q* Okay. All right. It seems you were down by his feet --
15 A Correct.
16 Q* -- when he first went down? Did he kick you?
17 A No.
18 Q* All right. You would have definitely remembered that;
19 right?
20 A I would have remembered getting kicked.
21 Q* Okay. All right.
22 MR. MANVILLE: Then continue on.
23 (Review of video)
24 Q* When he was taken off the ground -- we'll get there in a
25 second -- did you help lift him off the ground or did you

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1 not have hands on anymore?
2 A I continued with the escort and helped lift him up off the
3 ground.
4 Q* Okay.
5 A And there's a little bit of counter-productivity going on.
6 MR. MANVILLE: Okay.
7 (Review of video)
8 MR. MANVILLE: Stop.
9 Q* Is that you at the back part?
10 A That is. I'm on the escort now.
11 Q* Right. And is that that woman you mentioned earlier, the
12 short woman?
13 A Gose, yes.
14 Q* Okay. That's -- okay. I didn't remember her name. So
15 you're standing right in front of her about, you know, and
16 kind of in the right-hand --
17 A In this screen --
18 Q* Right.
19 A -- I am in front of her, but like two seconds ago she was in
20 front of me helping stand him up.
21 Q* Okay. All right.
22 MR. MANVILLE: All right. Continue.
23 MS. SPARKS: And that was at 1:20.
24 MR. MANVILLE: All right.
25 (Review of video)

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18 (Pages 66 to 69)

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1 Q* So he's bent over and being escorted; right?
 2 A Uh-huh (affirmative).
 3 Q* And I --
 4 MS. SPARKS: "Yes"?
 5 A Yes.
 6 MS. SPARKS: Sorry.
 7 Q* Yeah.
 8 A I'm sorry.
 9 THE WITNESS: No. Don't apologize if I'm wrong.
 10 Q* And you -- and you said that you had hand on him taking him
 11 to segregation; right?
 12 A Yes.
 13 Q* Okay. All right. Good.
 14 MR. MANVILLE: You want to go back to top of the
 15 stairs? You're good. All right.
 16 (Review of video)
 17 MR. MANVILLE: Stop there. See whether we can do
 18 it. We had problems with it.
 19 (Review of video)
 20 Q* So did the hip thing happens before here?
 21 A I don't know where you're at.
 22 Q* All right. Well, you're going down the stairs.
 23 A Well, yes, it happened before that.
 24 Q All right.
 25 MR. MANVILLE: Time to go back a little bit

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1 further.
 2 (Review of video)
 3 A It's hard to see. It's subtle.
 4 Q* Oh, yeah. No; no.
 5 (Review of video)
 6 THE WITNESS: There's a glare from the window.
 7 The current angle --
 8 MR. MANVILLE: Right.
 9 THE WITNESS: -- where you just moved it.
 10 MR. MANVILLE: Okay. No. We can -- we can shut
 11 it.
 12 MS. SPARKS: Does that help you?
 13 THE WITNESS: That helps.
 14 MS. SPARKS: Okay.
 15 MR. MANVILLE: Okay. Sometime I got to hit four
 16 and sometime I got to hit five.
 17 Q* When you see the hip thing, let me know.
 18 (Review of video)
 19 Cantrell is now on the stairs; right?
 20 A Yes.
 21 Q* And it is :32.
 22 MR. MANVILLE: Okay. I want to go here and go
 23 down for a minute -- come on.
 24 (Review of video)
 25 Q* At :42, it looks like you have your right hand on the back

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1 of his neck. I'm just saying, it looks like it; right?
 2 A Well, yeah, I guess.
 3 Q* Okay. Did you actually have your right hand on the back of
 4 his neck?
 5 A Is this a trick question?
 6 Q* No.
 7 A Yes. I absolutely have my hand on the back of his neck.
 8 Q* Okay. Because like you said, the angle and everything
 9 doesn't, you know, kind of distorts it some.
 10 A Okay.
 11 Q* So I'm just -- I just want to make sure.
 12 A Okay.
 13 Q* Okay. So when you took him down, you had your hand on the
 14 back of his neck?
 15 A I don't have my hand on the back of his neck right now.
 16 Q* Right. But when you were taking him down you did; right?
 17 A At the beginning steps, correct.
 18 Q* Okay.
 19 MR. MANVILLE: Anything else you want? Oh.
 20 MS. KESHISH: My questions.
 21 MR. MANVILLE: All right.
 22 MS. KESHISH: You done with video?
 23 MR. MANVILLE: Yeah.
 24 Q So you are aware that the hearing officer found the
 25 plaintiff not guilty of assault on staff?

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1 A Yes.
 2 MS. SPARKS: Objection as to foundation. Sorry.
 3 Go ahead. You said "yes"?
 4 A I'm -- I'm aware that that happened.
 5 Q So what happened after you removed the plaintiff from the
 6 housing unit?
 7 A I don't understand exactly what you're getting at.
 8 Q What path did you take to segregation? Did you take the
 9 sidewalk all the way? Outside?
 10 A That's the only way you can take is the sidewalk.
 11 Q* Well, our escort today said you could cut across grass. You
 12 don't have to follow the sidewalk?
 13 MS. SPARKS: He gave his answer.
 14 Q Are there cameras on the way to segregation?
 15 A Yes.
 16 Q Outside of the housing unit?
 17 A Yes.
 18 Q Are there blind spots that cameras do not cover?
 19 A I don't think so.
 20 Q So during the escort to segregation what other officers were
 21 present besides yourself?
 22 A Earegood.
 23 Q And?
 24 A Oh, Heilig.
 25 Q And where were they during the escort?

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19 (Pages 70 to 73)

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1 Q Yes, we did.
 2 A **Okay. Yup, then the second video.**
 3 Q Okay. And when you have a prisoner and you're escorting
 4 that individual and you lose control over the escort, what
 5 are your concerns in that?
 6 A **Safety of everyone around us.**
 7 Q And so here when you lost control over Prisoner Cantrell at
 8 several points, in your training and your understanding what
 9 is it that you need to do to take over that situation?
 10 A **Gain control of the inmate.**
 11 Q And what does a proper escort look like?
 12 A **Could you be more specific?**
 13 Q Sure. So in your training is there a specific way that you
 14 need to escort a prisoner?
 15 A **There are a couple different ways in our training.**
 16 Q Okay.
 17 A **One of which being you can just grab onto their shoulder if**
 18 **they're being compliant. Another, if they're noncompliant,**
 19 **that's when you can use the shoulder lock position that --**
 20 THE WITNESS: -- I don't remember your name.
 21 MR. MANVILLE: Manville.
 22 THE WITNESS: Attorney Manville, is that --
 23 MR. MANVILLE: Yeah.
 24 A **Attorney Manville had asked me to explain earlier. Those**
 25 **are both within training.**

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1 Q Which escort style are you going to use first?
 2 A **I would use just grabbing onto the arm until they prove that**
 3 **they're combative.**
 4 Q And when you receive some kind of resistance in the form of
 5 a prisoner's bicep tensing --
 6 A **Right.**
 7 Q -- would you then change that style to something like the
 8 shoulder?
 9 A **Yes.**
 10 Q Okay. And when we reviewed the video here today in the
 11 frame by frame method, so to speak -- so Mr. Manville kind
 12 of went frame by frame for you pressing the keyboard -- were
 13 you able to get a clear understanding as to the movements of
 14 Prisoner Cantrell in that frame by frame?
 15 A **Yes.**
 16 Q Okay. Now were you able to see in the frame by frame when
 17 Prisoner Cantrell threw his hip into Officer Heilig?
 18 A **I could see where he plants his foot and leans to the left,**
 19 **yes.**
 20 Q And earlier you testified he was planting his foot, you're
 21 meaning it was at that point because you were present, it
 22 was your understanding he was getting ready to kind of
 23 thrust himself into Officer Heilig?
 24 A **Correct; yes.**
 25 Q Okay.

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1 MS. SPARKS: All right. I have no further
 2 questions.
 3 EXAMINATION
 4 BY MR. MANVILLE AND MS. KESHISH:
 5 Q* Tell me if my viewpoint as to planting a foot is wrong.
 6 Okay. I played football. When I passed the ball as a
 7 quarterback I would plant my foot. If I played baseball and
 8 I'm going to go throw a ball, I plant my foot. Would you
 9 agree with that?
 10 MS. SPARKS: Objection as to speculation and
 11 foundation. Go ahead and answer the question.
 12 A **I never played football.**
 13 Q* **You play baseball?**
 14 A **Yes, but I was never a pitcher. But, yes --**
 15 Q* **Okay.**
 16 A **-- you do have to plant your foot.**
 17 Q* **For, you know, if you're second base, outfield, before you**
 18 **throw it; right?**
 19 A **Correct.**
 20 Q* **Okay. And is that what you're referring to when you're**
 21 **saying that he planted his foot?**
 22 A **He planted his foot to -- to get a solid ground for him when**
 23 **he moved his body to the left.**
 24 Q* **Well --**
 25 A **And I will 100 percent agree with you. When you watch the**

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1 **video from the front coming down the stairs, it is -- it is**
 2 **hard to see. It -- it is -- it is hard to notice the**
 3 **subtlety. And he's a short, big dude. He's got a low**
 4 **center of gravity and his weight goes -- goes a long way**
 5 **pretty -- pretty easy.**
 6 Q* **So do you have to be able to plant your -- in this case did**
 7 **he really have to plant his foot to be able to move his hip**
 8 **to that amount that you're claiming?**
 9 MS. SPARKS: Objection as to foundation. Go ahead
 10 and answer.
 11 A **I don't know if he had to.**
 12 Q* **So I'm just -- okay. Because before somebody -- because**
 13 **you're the one that said planted the foot and that's why**
 14 **I -- I'm asking.**
 15 A **Yes. I did say that, correct.**
 16 Q* **Okay. And, you know, what's your definition, what you mean**
 17 **by it. Okay.**
 18 MR. MANVILLE: I have nothing else. We're a wrap.
 19 THE WITNESS: Okay. Thank you.
 20 MS. SPARKS: Yup, we're done.
 21 (Deposition concluded at 12:53 p.m.)
 22
 23 -0-0-0-
 24
 25

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